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DAIMLERCHRYSLER

December 15, 2006

DaimlerChrysler Corporation

Stephan J. Speth

Director

Vehicle Compliance & Safety Affairs

Mr. Thomas Z. Cooper, Chief
Vehicle Integrity Division
Office of Defects Investigation
National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

Dear Mr. Cooper:

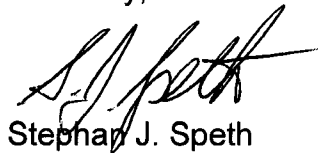
Reference: NVS-212am; PE06-046

This document contains DaimlerChrysler Corporation's ("DCC") response to the referenced inquiry regarding rear quarter glass window retention on 2006 model year Chrysler PT Cruiser vehicles. In reaching our analysis and conclusions, and by providing the information contained herein, DCC is not waiving its claim to attorney work product and attorney-client privileged communications.

DCC is not aware of any complaints of the subject condition involving Chrysler PT Cruiser convertible vehicles, nor is DCC aware of any crashes or injuries as a result of the subject condition involving Chrysler PT Cruiser sedan or convertible vehicles.

Since the opening of this investigation, DCC has initiated a thorough investigation and analysis, and DCC continues to assess this condition.

Sincerely,


Stephan J. Speth

Attachment and Enclosures

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- Q1. State, by model and model year, the number of subject vehicles DCC has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DCC, state the following:**
- a. Vehicle identification number (VIN);**
 - b. Make;**
 - c. Model;**
 - d. Model Year;**
 - e. Date of manufacture;**
 - f. Date warranty coverage commenced; and**
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).**

Provide the table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

- A1. During the 2006 model year, DaimlerChrysler Corporation ("DCC") manufactured 143,111 Chrysler PT Cruiser vehicles (DCC body code designation is "PT") for sale or lease in the United States. Of this total vehicle volume, there were 11,088 2-door convertibles, designated by body style PT27, and 132,023 4-door hatchback sedans, designated by body style PT44, manufactured.**

The detailed response that lists the production data is provided in Enclosure 1 as a Microsoft Access 2000 file, titled "PRODUCTION DATA".

NOTE: UNLESS OTHERWISE INDICATED IN THE RESPONSE TO ANY OF THE QUESTIONS, THIS DOCUMENT CONTAINS INFORMATION THROUGH OCTOBER 31, 2006, THE DATE THE INFORMATION REQUEST WAS RECEIVED.

- Q2. State the number of each of the following, received by DCC, or of which DCC is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:**
- a. Consumer complaints, including those from fleet operators;**
 - b. Field reports, including dealer field reports;**
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;**
 - d. Property damage claims;**

- e. **Third-party arbitration proceedings where DCC is or was a party to the arbitration; and**
- f. **Lawsuits, both pending and closed, in which DCC is or was a defendant or codefendant.**

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and DCC's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

- A2. The following summarizes the non-privileged reports received by DCC that relate to, or may relate to, the alleged condition in the subject vehicles. DCC has conducted a reasonable and diligent search of our normal repositories of such information.

See Table below for breakdown of VIN by report type. Each box within the shaded area represents the number of unique VINs with the corresponding report type associated with it. For example, the cell in the table that lies in the VOQ column and the CAIR row indicates that one VIN had both a VOQ report and a CAIR report that may be related to the alleged condition.

Totaling a single row across the columns yields the total number of that type of report. The number of unique VINs is established by summing the total of cells within the shaded area.

In total, there are 49 complaints affecting 40 unique vehicles as indicated in the shaded area of the table above. Reports associated with six of the unique VINs did not provide sufficient description to determine if the complaint involved the suspect component and were considered possibly related, while four others describe a condition of looseness.

	VOQ	CAIR	FIELD	LEGAL	DUPLICATES	TOTALS
VOQ	1	1	0	0	0	2
CAIR	1	32	2	0	6	41
FIELD	0	2	4	0	0	6
LEGAL	0	0	0	0	0	0
					total	49

- a. There are a total of 43 customer complaints (CAIR and VOQ) including two NHTSA VOQs distributed a volume of over 143,111 vehicles sold. The 41 other (non-VOQ) customer complaints contain 35 unique vehicles.

The original list of VOQ's received from NHTSA contained two VOQs. One of these has a related customer complaint in the DCC system. The remaining VOQ is a unique report which does not have a related complaint in the DCC system.

- b. There are a total of six field reports that relate to the alleged condition. Two of these have related customer complaints in the DCC system.
- c. There are no reported crashes, injuries, or fatalities that are responsive to this inquiry.
- d. There is one complaint responsive to this inquiry alleging property damage.
- e. There are no third-party arbitration proceedings involving DCC that are responsive to this inquiry.
- f. There are no legal claims against DCC, or notice received by DCC that are responsive to this inquiry. There are no lawsuits, pending or closed, involving DCC that are responsive to this inquiry.

Q3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. DCC's file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
- d. Vehicle's VIN;
- e. Vehicle's make, model and model year;
- f. Vehicle's mileage at time of incident;
- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether property damage is alleged;
- k. Number of alleged injuries, if any; and
- l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2000, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

A3. The detailed response that lists the customer complaints and field reports, from Request No. 2, as requested in Items a. through l. is provided in Enclosure 2 as a Microsoft Access 2000 table, entitled "REQUEST NUMBER TWO DATA".

Q4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DCC used for organizing the documents.

A4. Copies of all documents within the scope of Request No. 2 are provided in Enclosure 2 – COMPLAINT DETAILS, folder "Customer Complaints".

The data within Enclosure 2 is organized in the following manner: the Customer Complaint folder contains sub-folders for each category (i.e., CAIR complaints, Field Reports, etc.). The CAIR complaints folder contains additional sub-folders with the complaint correspondence (as applicable).

Q5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by DCC to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. **DCC's claim number;**
- b. **Vehicle owner or fleet name (and fleet contact person) and telephone number;**
- c. **VIN;**
- d. **Repair date;**
- e. **Vehicle mileage at time of repair;**
- f. **Repairing dealer's or facility's name, telephone number, city and state or ZIP code;**
- g. **Labor operation number;**
- h. **Problem code;**
- i. **Replacement part number(s) and description(s);**
- j. **Concern stated by customer; and**
- k. **Comment, if any, by dealer/technician relating to claim and/or repair.**

Provide this information in Microsoft Access 2000, or a compatible format, entitled "WARRANTY DATA."

- A5. There have been 583 warranty claims associated with the specified labor operation codes that may be responsive to this investigation.

The detailed response that lists the warranty claim details, as requested in items a. through k. is provided in Enclosure 3 as a Microsoft Access table, titled "WARRANTY DATA".

- Q6. Describe in detail the search criteria used by DCC to identify the claims identified in response to Request No. 5, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by DCC on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that DCC offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.**

- A6. The search criteria used by DCC to identify claims to Request No. 5 can be found in the chart below:

DESCRIPTION OF REPAIR	LABOR OPERATION
GLASS QUARTER WINDOW-Replace	23-30-30-00
GLASS QUARTER WINDOW-Replace Folding Top-Rear-Movable-Right	23-30-30-02
GLASS QUARTER WINDOW-Replace Folding Top-Rear-Movable-Left	23-30-30-03
GLASS QUARTER WINDOW-Replace-Rear-Fixed Glass-Right	23-30-30-04
GLASS QUARTER WINDOW-Replace-Rear-Fixed Glass-Left	23-30-30-05

FAILURE CODE	DESCRIPTION
C1	Chipped
DD	Delaminated
FC	Fastener broken or cracked
11	Broken or cracked
51	Improperly installed
74	Bolts – Tight, Loose, Missing
81	Poor Fit
UC	Uncodeable

The subject vehicles are covered by a 3-year or 36,000 miles Basic Limited Warranty, excluding normal maintenance and wear items. Additionally, DCC dealers often perform repairs at no charge to the customer on out-of-warranty vehicles as a goodwill gesture. There are no extended warranty options applicable to the subject components.

- Q7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DCC has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that DCC is planning to issue within the next 120 days.**
- A7. There are no service, warranty, and/or other documents (nor are there any planned) that relate to, or may relate to, the alleged defect in the subject vehicles, that DCC has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities.
- Q8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being**

conducted, are planned, or are being planned by, or for, DCC. For each such action, provide the following information:

- a. Action title or identifier;**
- b. The actual or planned start date;**
- c. The actual or expected end date;**
- d. Brief summary of the subject and objective of the action;**
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and**
- f. A brief summary of the findings and/or conclusions resulting from the action.**

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

- A8. In August of 2005, DCC's Customer Advocate Group (CAG) began studying an increase in early warranty claims related to the fixed rear quarter glass. The study revealed that an adjustment was made in the thickness of the window mounting in an attempt to address a fit condition of the stationary rear quarter glass used on PT44 sedan vehicles. This adjustment may have affected the retention of the side quarter glass on some of the subject vehicles. Data indicated at that time that vehicles with the potential for the alleged condition would have already experienced the issue and would have been corrected through warranty.

DCC is not aware of any complaints or warranty narratives responsive to the alleged defect with the moveable rear quarter glass used on PT27 convertible vehicles, nor were any adjustments made to the moveable rear quarter glass.

Since the opening of PE06-046, DCC initiated a survey of 2006MY PT44 employee lease vehicles to measure the load retention of the rear quarter glass and determine the differences, if any, between those affected by the mounting thickness adjustment and those that were not affected. A procedure and fixtures were developed to push out the fixed rear quarter glass on sample vehicles and measure the retention loads.

This assessment included the measurement of stresses seen on the glass under extreme conditions at the DCC wind tunnel and proving grounds facilities to determine the expected retention duty cycle requirements of the rear quarter glass. Data was collected at various vehicle speeds, window up/down conditions, blower motor speeds, as well as different road events. This data is intended to be used in conjunction with the survey results to determine the scope and the affects of the thickness adjustment. These assessments are ongoing.

The detailed response that describes these actions, as requested in items a. through f. is provided in Enclosure 4 as a Microsoft Spreadsheet, titled "ACTION SUMMARY".

The documents related to these actions have been summarized, as requested, in a Microsoft Spreadsheet, titled "ACTION DOCUMENT SUMMARY", also provide in Enclosure 4.

Copies of these documents have been submitted in Enclosure 8 – CONFIDENTIAL – TEST and SURVEY DOCUMENTATION (CD-Rom) to Mr. Anthony M. Cooke, Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.

Q9. Describe all modifications or changes made by, or on behalf of, DCC in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:

- a. **The date or approximate date on which the modification or change was incorporated into vehicle production;**
- b. **A detailed description of the modification or change;**
- c. **The reason(s) for the modification or change;**
- d. **The part numbers (service and engineering) of the original component;**
- e. **The part number (service and engineering) of the modified component;**
- f. **Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;**
- g. **When the modified component was made available as a service component; and**
- h. **Whether the modified component can be interchanged with earlier production components.**

Also, provide the above information for any modification or change that DCC is aware of which may be incorporated into vehicle production within the next 120 days.

A9. The detailed summary of design change information for the 2006 model year PT rear quarter glass is being submitted as Enclosure 5 – CHANGE HISTORY - CONFIDENTIAL to Mr. Anthony M. Cooke, Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.

Q10. State the number of subject components that DCC has sold that may be used in the subject vehicles by component name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which DCC is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

A10. The part sales and supplier contact information has been included in Enclosure 6 – SERVICE PART SALES.

In nearly all cases, it is impossible to determine what these part sales are for. There are other customer issues (i.e., customer damage, collision) that are not related to this alleged condition, yet still trigger sales/replacement of the subject components. The Chrysler PT Cruiser for international markets uses the same service rear quarter glass as the subject vehicle. This same part is also used to service Chrysler PT Cruisers manufactured in model years 2001 thru 2006 and was used for production on 2003 thru 2006 model year Chrysler PT Cruisers. No other DCC vehicles utilize this rear quarter glass for any other make or model year.

DCC has concluded that the part sales cannot be used to determine any trend related to the alleged condition.

Q11. Provide a detailed process on the assembly of the subject component to the subject vehicle.

A11. The detailed process of the assembly of the quarter glass to the vehicle has been included in Enclosure 7 – ASSEMBLY PROCESS - CONFIDENTIAL to Mr. Anthony M. Cooke, Office of the Chief Counsel, under separate cover with a request for confidential treatment of information.

Q12. Furnish DCC's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses;

- e. **What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and**
- f. **The reports included with this inquiry.**

A12. DCC's study into the increase in warranty claims in August of 2005 produced part returns indicating the attachment studs that were encapsulated via stand-off embossments or "datums" were pulled through. A contributing factor to this issue is believed to be an adjustment in the thickness of the window mounting in an attempt to address a fit condition. The correction of this adjustment was made in early September of 2005. DCC is not aware of any complaints of the alleged defect on vehicles manufactured after corrective actions were implemented.

Data indicated at that time that vehicles with the potential for the alleged condition would have already experienced the issue and would have been corrected through warranty.

This issue affects only the rear quarter panel fixed glass, which is only used on Chrysler PT Cruiser sedans, designated by the body style PT44. Chrysler PT Cruiser convertibles are equipped with a moveable rear quarter glass that utilizes an attachment method that differs from the fixed glass. DCC is not aware of any responsive complaints or warranty narratives responsive to the moveable rear quarter glass on the subject vehicles.

The resulting effects of this issue are that the fixed rear quarter glass panel may become loose, increasing the amount of wind noise in the vehicle or may separate while driving. DCC is not aware of any reports of crashes or injuries attributed to this issue.

DCC continues to investigate this issue. Analysis of the required push out forces on survey vehicles is currently underway. Data collected at the DCC wind tunnel and proving grounds facilities will be utilized in conjunction with the survey results to attempt to further understand the condition.

DAIMLERCHRYSLER

DaimlerChrysler Corporation
Stephan J. Speth
Director
Vehicle Compliance & Safety Affairs

December 15, 2006

Mr. Anthony M. Cooke
Chief Counsel
National Highway Traffic Safety Administration
400 Seventh Street, S.W. Rm. 5219
Washington, DC 20590

Re: Request for Confidential Treatment of Information Provided in PE06-046

Dear Mr. Cooke:

DaimlerChrysler Corporation ("DCC") is submitting information to the NHTSA Office of Defects Investigation in connection with the above referenced Information Request. Based on a careful review of the submission, DCC has determined that some of the information (as set forth more fully below) in the attached CD-ROM discs would cause DCC to suffer substantial competitive harm if disclosed and therefore should be accorded confidential treatment under this agency's regulations at 49 C.F.R. Part 512 and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4).¹ Therefore, DCC is submitting the information, together with this request for confidential treatment, to the Office of Chief Counsel.

As required by Part 512, DCC is submitting certificates executed by responsible DCC and Vitro Automotive personnel. The information required by Part 512 is set forth below.

A. Description of the Information (49 C.F.R. § 512.8(a))

The information for which confidential treatment is being sought consists of a series of documents created by a confidential internal investigative procedure called "TAG" in Enclosure 8. TAG is a confidential process that DCC developed to resolve issues quickly. The PDF documents have the Bates page numbers of DCC-PE06-046-000012 - 000120. Within the TAG documents there are also 2 videos, Test Result Video 1 & 2; 2 pictures, A Datum Broken and Washer; and there are 4 Excel spreadsheets, CTO Tras PT-44, WDSS Claims LOP, PT Qtr Glass, and PT-44 CTO. These files do not contain Bates page numbers. Confidential treatment is also sought for documents showing DCC's analysis of testing data in Enclosure 8, Scope Determination Documents. The PDF files have Bates page numbers of DCC-PE06-046-000004

¹ DCC has taken steps to assure that the CD's are free of any errors or defects that would prevent NHTSA from opening each file on the disc. If, however, the agency is unable to open any of the files, DCC respectfully requests that the agency inform DCC of the issue, so that DCC may take steps to supply NHTSA's Office of Chief Counsel with a disc that is fully functional.

- 000011. This folder also contains 3 Excel spreadsheets, PT Rear Quarter Glass Survey Data Log, Proving Grounds Data Summary and Wind Tunnel Test Data. A document containing DCC's operational procedures is in Enclosure 7 with Bates page number DCC-PE06-046-000001-000003. An Excel spreadsheet change notice showing the design changes that took place with the subject component is in Enclosure 5.

The table attached to this letter will more fully describe the documents.

B. Confidentiality Standard (49 C.F.R. § 512.8(b))

This submission is subject to the substantial competitive harm standard set forth in 49 C.F.R. § 512.15(b) for information that a submitter is required to provide to the agency.

C. Justification for Confidential Treatment (49 C.F.R. § 512.8(c))

This agency's regulations and Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552(b)(4), protect the confidentiality of information that would be likely to cause substantial competitive harm to the submitter if disclosed. *See, e.g.* 49 C.F.R. § 512.15(b); *Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974). FOIA Exemption 4 was enacted to prevent disclosures that would "eliminate much of the time and effort that would otherwise be required to bring to market a product competitive with the [submitter's] product." *Public Citizen Health Research Grp. v. FDA*, 185 F.3d 898, 905 (D.C. Cir. 1999).

In addition, FOIA Exemption 4 was enacted to prevent open records requirements from providing windfalls to competitors when private submitters have provided commercial or financial information to the government: "Because competition in business turns on the relative costs and opportunities faced by members of the same industry, there is a potential windfall for competitors to whom valuable information is released under FOIA. If those competitors are charged only minimal FOIA retrieval costs for the information, rather than the considerable costs of private reproduction, they may be getting quite a bargain. Such bargains could easily have competitive consequences not contemplated as part of FOIA's principle aim of promoting openness in government." *Worthington Compressors, Inc. v. Costle*, 662 F.2d 45, 51 (D.C. Cir. 1981).

Among the competitively-significant disclosures that FOIA Exemption 4 was enacted to prevent were disclosures that would reveal a firm's "operational strengths and weaknesses" to competitors. *See Nat'l Parks & Conservation Ass'n v. Kleppe*, 547 F.2d 673, 684 (D.C. Cir. 1976). The information at issue here should be protected under these standards.²

Competitors could determine how DCC uses its capabilities to investigate and analyze issues with its TAG system and use this information to improve their own investigative capabilities. This would save these DCC competitors the considerable time and money that DCC spent in developing these procedures and it would enable them to compete more effectively with DCC.

² As noted above, DCC is providing a table that identifies the confidential information on the enclosed discs, and specifies that location of the information (by folder name and Bates page numbers). The table also briefly states the basis for the confidentiality claims.

The release of these documents would give competitors an unfair advantage over DCC. This is the type of unfair advantage that Exemption 4 was enacted to protect against.

Testing procedures, set-ups and the analysis of test data is also confidential and would cause substantial competitive harm if disclosed. Competitors could discover how DCC sets up tests, the procedures it uses to test and how the test data is analyzed. NHTSA has recognized that design and developmental testing information should be protected under Exemption 4 because it reveals the scope, nature, and results of a submitter's proprietary and developmental testing, as well as the submitter's design and performance standards, design philosophies, and the reasons for various design choices. Such information could enable a competitor to develop and upgrade its own testing protocols, improve its design decisions, and gain insights into DCC's operational capacities.

Operational procedures should also be accorded confidential treatment because competitors could more effectively compete with DCC. Substantial competitive harm would happen with the disclosure of this document because it could relieve competitors of the costs and burdens of independently reviewing their own procedures and therefore enabling them to bring products competitive with DCC's products to market more quickly and at less cost. Competitors would also be able to determine the operational strengths and weaknesses of DCC.

The change notice spreadsheet reveals information about designs and design and manufacturing processes, reasons for changes in a product, as well as DCC lead-time and operational-capacity information. This information could enable DCC's competitors to improve their own designs and manufacturing processes, and compete more effectively against DCC which would cause substantial competitive harm to DCC.

D. Class Determination (49 C.F.R. § 512.8(d))

The information for which confidential treatment is being sought does not fit within a class determination.

E. Duration for Which Confidential Treatment is Sought (49 C.F.R. § 512.8(e))

Since DCC anticipates that the information will retain its competitive value indefinitely, DCC requests that the information be accorded confidential treatment permanently.

F. Contact Information (49 C.F.R. § 512.8(f))

Please direct all inquiries and responses to the undersigned at:

800 Chrysler Drive, CIMS 482-00-91
Auburn Hills, MI 48326
248-512-4188
SS6@dcx.com

If you receive a request for disclosure of the information for which confidential treatment is being sought before you have completed your review of our request, DCC respectfully requests notification of the request(s) and an opportunity to provide further justification for the confidential treatment of this information, if warranted.

Sincerely,



Stephan J. Speth

cc: Thomas Cooper

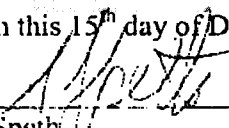
Attachment and Enclosures

Certificate in Support of Request for Confidentiality

I, Stephan J. Speth pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

- (1) I am DaimlerChrysler Corporation's Director, Vehicle Certification, Compliance and Safety Affairs and I am authorized by DaimlerChrysler Corporation to execute documents on its behalf;
- (2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);
- (3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;
- (4) This certification is based on the information provided by the responsible DaimlerChrysler Corporation personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside DaimlerChrysler Corporation;
- (5) Based upon that information, to the best of my knowledge, information and belief, the information for which DaimlerChrysler Corporation has claimed confidential treatment has never been released or become available outside DaimlerChrysler Corporation, except to certain contractors of DaimlerChrysler Corporation with the understanding that such information must be maintained in strict confidence;
- (6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside DaimlerChrysler Corporation because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and
- (7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of December, 2006



Stephan J. Speth

Certificate in Support of Request for Confidentiality

I, Miguel Gutiérrez Martínez de Escobar pursuant to the provisions of 49 C.F.R. Part 512, state as follows:

(1) I am attorney in fact of Vitro Automotriz, S.A. de C.V. ("Vitro") and I am authorized by Vitro to execute documents on its behalf;

(2) I certify that the information contained in the attached documents is confidential and proprietary data and is being submitted with the claim that it is entitled to confidential treatment under 5 U.S.C. 552(b)(4);

(3) I hereby request that the information contained in the indicated documents be protected on a permanent basis;

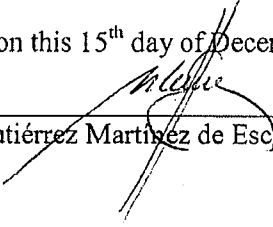
(4) This certification is based on the information provided by the responsible Vitro personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside Vitro;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which Vitro has claimed confidential treatment has never been released or become available outside Vitro, S.A. de C.V., except to DaimlerChrysler and certain contractors of Vitro and/or DaimlerChrysler with the understanding that such information must be maintained in strict confidence;

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside Vitro because of unauthorized or inadvertent disclosure (except as stated in paragraph 5); and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of December, 2006



Miguel Gutiérrez Martínez de Escobar

**ATTACHMENT TO REQUEST FOR CONFIDENTIAL
TREATMENT OF CERTAIN DOCUMENTS SUBMITTED IN
CONNECTION WITH PE06-046 WITHIN ENCLOSURES 5, 7 & 8
CONFIDENTIAL**

QUESTION # SOURCE	ENCLOSURE	FILE/DOCUMENT NAME	DOCUMENT DESCRIPTION	BATES PAGE #	CONFIDENTIALITY JUSTIFICATION
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	TAG 10738	Copy of Web Page for TAG 10738 (Internal Investigative Procedures)	DCC-PE06-046-000079 - 000082	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	CONFIDENTIAL TEST RESULT VIDEO 1	Video clip of loose stud in embossment (Internal Investigative Procedures and Testing Data)	N/A Video	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes and testing procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	CONFIDENTIAL TEST RESULT VIDEO 2	Video clip of loose stud in embossment (Internal Investigative Procedures and Testing Data)	N/A Video	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes and testing procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	CONFIDENTIAL A DATUM BROKEN	Picture of broken embossment (Internal Investigative Procedures)	N/A Picture	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	CONFIDENTIAL WASHER	Picture of containment proposal (Internal Investigative	N/A Picture	Confidential on the grounds that document sets forth DCC internal investigative

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			Procedures)		procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	QTR GLASS STUDS	Photos showing variation in studs used (Internal Investigative Procedures)	DCC-PE06- 046- 000076- 000077	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	TAP TEST RESULTS	Validation of washer containment (Internal Investigative Procedures and Test Data)	DCC-PE06- 046- 000087- 000088	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes and testing results.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	RT8323AV2430501	CAG report (Internal Investigative Procedures)	DCC-PE06- 046-000078	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 VITRO	8 – CONFIDENTIAL/ TAG Documents/ Supplier Documents	CTO TRAS PT -44	Process capability of detailed part (Internal Investigative Procedures)	N/A Excel Spreadsheet (Translated version located in Translated folder)	Confidential on the grounds that document sets forth Vitro internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	TAP RCA	Root Cause Summary (Internal Investigative Procedures)	DCC-PE06- 046- 000083- 000086	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	QTR GLASS PROCESS TAP	10 car torque measurement sampling study (Internal	Translated – DCC-PE06- 046- 000012-	Confidential on the grounds that document sets forth DCC internal

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			Investigative Procedures)	000014 Spanish-DCC-PE06-046-000073-000075	investigative procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	TEMP CHAMBER TEST PICTURES W-WASHERT	Shaker testing validation of containment (Internal Investigative Procedures and Test Data)	DCC-PE06-046-000089-000101	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes and testing data.
8 VITRO	8 - CONFIDENTIAL/ TAG Documents/ Supplier Documents	STUD MEASUREMENTS	Description of added in-process part qualification (Internal Investigative Procedures)	DCC-PE06-046-000120	Confidential on the grounds that document sets forth Vitro internal investigative procedures and processes.
8 VITRO	8 - CONFIDENTIAL/ TAG Documents/ Supplier Documents (also a duplicate Spanish copy in DCC Documents)	PT44 CTO MEDIDAS NOMINALES	Design sections of uninstalled part (Internal Investigative Procedures and Designs)	Translated - DCC-PE06-046-000102-000107 Spanish - DCC-PE06-046-000108-000113	Confidential on the grounds that document sets forth Vitro internal investigative procedures and processes as well as designs of the subject component.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	PT44 QTR DATUMS NOMINAL HEIG	Assessment of part sampling at TAP (Internal Investigative Procedures)	DCC-PE06-046-000015	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 - CONFIDENTIAL/ TAG Documents/ DCC Documents	QNAS FOR REAR QUARTER GLASS	Summary of known complaints (Internal Investigative	DCC-PE06-046-000070-000072	Confidential on the grounds that document sets forth DCC internal investigative

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			Procedures)		procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	FULL QNAS 233030	Detailed QNAS (Internal Investigative Procedures)	DCC-PE06- 046- 000019- 000066	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	EWT CONTROL LIMIT VIOLATION	LOP MIS control charts (Internal Investigative Procedures)	DCC-PE06- 046-000018	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	WDSS CLAIMS LOP 233030	Claim Narratives (Internal Investigative Procedures)	N/A Excel Spreadsheet	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	PT QTR GLASS	Claim Narrative Summary (Internal Investigative Procedures)	N/A Excel Spreadsheet	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	C-1000 FOR 233030	Labor Op C/1000 (Internal Investigative Procedures)	DCC-PE06- 046- 000016- 000017	Confidential on the grounds that document sets forth DCC internal investigative procedures and processes.
8 DCC	8 – CONFIDENTIAL/ TAG Documents/ DCC Documents	PER P0901-S05-01	Summary of trial run PER of containment fix (Internal Investigative Procedures)	DCC-PE06- 046- 000067- 000069	Confidential on the grounds that document sets forth DCC internal investigative procedures and

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					processes.
8 VITRO	8 – CONFIDENTIAL/ TAG Documents/ Supplier Documents	QTR GLASS X-Y TEST ON SEPT. 1 ST	Quality Control Process – Pull out test (Internal Investigative Procedures and Test Data)	DCC-PE06- 046- 000114- 000119	Confidential on the grounds that document sets forth Vitro internal investigative procedures and processes and testing data.
8 VITRO	8 – CONFIDENTIAL/ TAG Documents/ Supplier Documents	PT-44 CTO	Analysis and Part Measurement Study (Internal Investigative Procedures and Design Information)	N/A Excel Spreadsheet	Confidential on the grounds that document sets forth Vitro internal investigative procedures and processes and design information.
8 DCC	8 – CONFIDENTIAL/ Scope Determination Documents	PROCEDURE FOR QUARTER GLASS TESTING	Procedure for suspect period survey (Testing Analysis)	DCC-PE06- 046- 000007- 000011	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 – CONFIDENTIAL/ Scope Determination Documents	PT REAR QUARTER GLASS SURVEY DATA LOG	Results of suspect period survey (Testing Analysis)	N/A Excel Spreadsheet	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 – CONFIDENTIAL/ Scope Determination Documents/ CPG Testing	PROVING GROUNDS DATA SUMMARY	Testing in support of survey procedure (Testing Analysis)	N/A Excel Spreadsheet	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 – CONFIDENTIAL/ Scope Determination Documents/ CPG Testing	PROVING GROUNDS EVENT SUMMARY	Testing in support of survey procedure (Testing Analysis)	DCC-PE06- 046-000004	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 – CONFIDENTIAL/ Scope Determination	WIND TUNNEL TEST DATA	Testing in support of survey procedure	N/A Excel Spreadsheet	Confidential on the grounds documents set forth information on analysis of testing

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	Documents/ CPG Testing		(Testing Analysis)		results.
8 DCC	8 -- CONFIDENTIAL/ Scope Determination Documents/ Wind Tunnel Testing	WIND TUNNEL TEST SUMMARY	Testing in support of survey procedure (Testing Analysis)	DCC-PE06-046-000005	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 -- CONFIDENTIAL/ Scope Determination Documents/ Wind Tunnel Testing	CONFIDENTIAL SET UP PHOTO 1.JPG THRU SET UP PHOTO 8	Testing in support of survey procedure (Testing Analysis)	N/A Pictures	Confidential on the grounds documents set forth information on analysis of testing results.
8 DCC	8 -- CONFIDENTIAL/ Scope Determination Documents	2006 PT QUARTER GLASS SURFACE AREA DATA	Surface area calculations (Testing Analysis)	DCC-PE06-046-000006	Confidential on the grounds documents set forth information on analysis of testing results.
11 DCC	7 -- Assembly Process - CONFIDENTIAL	2006 PT REAR QUARTER GLASS AMPS	Assembly process of glass to vehicle (DCC Operational Procedures)	DCC-PE06-046-000001-000003	Confidential on the grounds document sets forth information on DCC Operational Procedures and competitors could improve their own operations without the time and expense necessary and therefore compete more effectively against DCC.
9 DCC	5 -- Change History - CONFIDENTIAL	CHANGE HISTORY -- 2006 MY PT REAR QUARTER GLASS	Design Change Notice (Design Processes)	N/A Excel Spreadsheet	Confidential on the grounds that document sets forth information on DCC design and manufacturing process changes, timing of changes and the process of the changes and competitors could

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					learn about DCC design processes to improve their own processes to more effectively compete.